

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
at DAYTON**

RYAN SCHULTE, individually and on behalf  
of all other Ohio residents similarly situated,

Plaintiff,

v.

LIBERTY INSURANCE CORPORATION,

Defendant.

Case No. 3:19-cv-00026

Judge Thomas M. Rose

ANDREW CARTER, ANTHONY TURCO,  
LAURA RALPH, and JAMES RALPH,  
individually and on behalf of all other Ohio  
residents similarly situated,

Plaintiffs,

v.

SAFECO INSURANCE COMPANY OF  
INDIANA, LM INSURANCE  
CORPORATION, and LIBERTY MUTAL  
FIRE INSURANCE COMPANY,

Defendants.

Case No. 3:20-cv-00002

Judge Thomas M. Rose

**PLAINTIFFS' MOTION FOR SERVICE AWARDS TO CLASS REPRESENTATIVES  
AND AWARDS OF ATTORNEYS' FEES, COSTS, AND  
EXPENSES TO CLASS COUNSEL**

Pursuant to Rule 23(e) and (h) and Rule 54(d)(2) of the Federal Rules of Civil Procedure and the Parties' Settlement Agreement, Plaintiffs Ryan Schulte, Andrew Carter, Anthony Turco, and Laura Ralph and James Ralph (collectively, "Plaintiffs"), respectfully move the Court in the above-captioned action for an Order granting Plaintiffs' Motion for Service Awards to Class

Representatives and Awards of Attorneys' Fees, Costs and Expenses to Class Counsel. Specifically, Plaintiffs respectfully move the Court for the following awards:

1. Attorney's fees to Class Counsel in the amount of \$3,414,617.86 (or approximately 17.08% of the total benefit made available to the class and without any reduction in the payments to be made to class members);
2. Litigation costs and expenses to Class Counsel in the amount of \$16,641.93 that were incurred in prosecuting this class action; and
3. Service awards to each of the class representative Plaintiffs in the amount of \$7,500 each for their service to the Settlement Class.

This Motion is based upon the Parties' Settlement Agreement and supporting documents, and the entire files and proceedings herein.

For the reasons set forth in the accompanying Memorandum of Law and accompanying Declarations of Plaintiffs' counsel, Plaintiffs respectfully request that the Court grant this Motion.

Respectfully submitted,

/s/ Stephen G. Whetstone  
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*Class Counsel*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was filed and served via the Court's ECF filing system which will send electronic notices of same to all counsel of record on this the 11<sup>th</sup> day of May, 2021.

/s/ Stephen G. Whetstone